

HONORABLE MICHELLE PETERSON

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

NANNETTE BASA, an individual,

Plaintiff,

v.

BRAND SHARED SERVICES, LLC, a
Delaware corporation,

Defendant.

Case No. 2:21-cv-00754 JLR

REPLY DECLARATION OF EMMA
KAZARYAN IN SUPPORT OF
DEFENDANT BRAND SHARED
SERVICES, LLC'S MOTION FOR
PROTECTIVE ORDER QUASHING
DEPOSITION OF MEG NEWMAN

HEARING DATE:
FRIDAY, SEPTEMBER 9, 2022

LCR 26(c) Discovery Conference
Conducted on August 22, 2022

I, Emma Kazaryan, hereby declare:

1. I am one of the attorneys of record for Defendant Brand Shares Services, LLC ("Brand") in the above-captioned matter. I am over the age of eighteen and competent to testify in this matter. I base this declaration on my personal knowledge and on my review of the file maintained by my law firm in connection with this matter. That file is kept in the ordinary course of business and is timely and regularly updated.

2. Plaintiff's counsel has propounded five sets of interrogatories and requests for production to Brand.

3. Plaintiff's counsel has also noted at least eight depositions of Brand and its

DECLARATION OF EMMA KAZARYAN IN SUPPORT OF
DEFENDANT'S REPLY - 1
(CAUSE NO. 2:2-CV-00754 JLR)

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1 current and former employees (including one multi-topic CR 30(b)(6) deposition) and is
2 currently seeking a ninth deposition of a Brand employee. With the exception of Meg Newman,
3 Brand has produced (or intends to produce) each witness that is within its control.

4 4. Plaintiff's counsel has also requested numerous discovery conferences (more than
5 I have ever had on any one case in my entire career, including cases that were far more complex
6 and where the scope of potential damages was far greater). Each time, I have responded
7 promptly and made myself available as quickly as I could.

8 *I declare under penalty of perjury under the laws of the State of Washington that the*
9 *foregoing is true and correct to the best of my knowledge.*

10 Signed in Seattle, Washington this 9th day of September, 2022.

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12 /s/ Emma Kazaryan
13 Emma Kazaryan, WSBA No. 49885
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CERTIFICATE OF SERVICE

I hereby declare that on this 9th day of September, 2022, I caused a copy of ***Declaration of Emma Kazaryan in Support of Defendant Brand Shared Services, LLC's Reply to Motion for Protective Order Quashing Deposition of Meg Newman*** to be electronically filed with the Court using ECF-Filing system which will send notification of such filing to the following:

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s/Valerie Macan
Valerie Macan